

1 **DAVID Z. CHESNOFF, ESQ.**
2 **Nevada Bar No. 2292**
3 **RICHARD A. SCHONFELD, ESQ.**
4 **Nevada Bar No. 6815**
5 **CHESNOFF & SCHONFELD**
6 **520 South Fourth Street**
7 **Las Vegas, Nevada 89101**
8 **Telephone: (702)384-5563**
9 **Attorney for Defendant, *JOEL KENNETH AUSBIE***

7 **UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF NEVADA**

9 **UNITED STATES OF AMERICA**)

10 **Plaintiff-Appellee**)

11 **v.**)

CASE NO: 2:16-CR-00155-JCM-CWH

12 **JOEL KENNETH AUSBIE,**)

13 **Defendant-Appellant**)
14 _____)

15 **STIPULATION AND ORDER TO CONTINUE TIME TO RESPOND TO**
16 **GOVERNMENT'S MOTIONS FOR TURNOVER AND APPLICATION OF SEIZED**
17 **FUNDS TO RESTITUTION (ECF 173 and 174)**

18 **IT IS HEREBY STIPULATED AND AGREED**, by and between **MARK WOOLF, ESQ.**
19 Assistant United States Attorney, counsel for the United States of America, and **RICHARD A.**
20 **SCHONFELD, ESQ.**, counsel for Defendant, **JOEL KENNETH AUSBIE**, that Defendant Ausbie
21 shall have up to and including July 11, 2018, within which to file any response to the government's
22 Motions for Turnover and Application of Seized Funds to Restitution (ECF 173 and 174), currently
23 due on May 24, 2018 and May 25, 2018, respectively.
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1 **IT IS FURTHER STIPULATED AND AGREED**, by and between the parties herein that
2 the government shall have up to and including, July 25, 2018, within which to file any and all replies
3 to said motions.
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5 This stipulation is entered into for the following reasons:

6 1. Defendant Ausbie is currently in the custody of the Federal Bureau of Prisons in the
7 State of California and undersigned counsel need additional time to consult with Defendant
8 regarding the Government's Motions for Turnover and Application of Seized Funds to Restitution
9 (ECF 173 and 174);
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11 2. The government has no objection to this request.

12 **DATED** this 24th day of May, 2018.

13 **DAYLE ELIESON**

CHESNOFF & SCHONFELD

14 **United States Attorney**

15 _____
16 /s/
17 **MARK WOOLF, AUSA**
18 501 Las Vegas Blvd. South
19 Suite 1100
20 Las Vegas, Nevada 89101
21 Attorney for Plaintiff

 /s/
 RICHARD A. SCHONFELD, ESQ.
 Nevada Bar No. 6815
 520 South Fourth Street
 Las Vegas, Nevada 89101
 Attorney for Defendant, Joel Kenneth Ausbie

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10 **Attorney for Defendant, *JOEL KENNETH AUSBIE***

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CASE NO: 2:16-CR-00155-JCM-CWH

19 **JOEL KENNETH AUSBIE,**)

20 **Defendant-Appellant**)
21 _____)

22 **[PROPOSED] ORDER**

23 Based on the foregoing stipulation of the parties and with good cause appearing, **IT IS**
24 **THEREFORE ORDERED** that Defendant Ausbie shall have up to and including July 11, 2018,
25 within which to file any responses to the Government's Motions for Turnover and Application of
26 Seized Funds to Restitution (ECF 173 and 174), currently due on May 24, 2018 and May 25, 2018,
27 respectively.

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